## IN THE UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO EASTERN DIVISION

UNITED STATES OF AMERICA, :

Plaintiff, : CASE NO. 2:13 CR 00148

v. : JUDGE SARGUS

HAIDER ZAFAR, : ORAL HEARING REQUESTED

Defendant. :

## MOTION FOR RECONSIDERATION OF DETENTION ORDER

Defendant, Haider Zafar, through undersigned counsel, respectfully moves this Court for a hearing to reconsider detention in his case. The reasons in support of this Motion are set forth in the following Memorandum.

Respectfully submitted,

/s/ Samuel H. Shamansky

SAMUEL H. SHAMANSKY Ohio Supreme Court No. 0030772 523 South Third Street Columbus, Ohio 43215 T: (614) 242-3939 F: (614) 242-3999 shamanskyco@gmail.com

Counsel for Defendant

## **MEMORANDUM**

On May 28, 2013, Defendant made an initial appearance before Magistrate Judge Terrence P. Kemp. At that time, Defendant waived his right to a detention hearing pursuant to 18 U.S.C. 3142(f), and Magistrate Kemp ordered him detained. The waiver executed by Defendant included a reservation of the right to request a hearing at a later date, and the Magistrate's Order explicitly provided that a hearing may be held upon written motion.

Accordingly, Defendant respectfully requests that the Court schedule a detention hearing in this case.

Respectfully submitted,

/s/ Samuel H. Shamansky

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Counsel for Defendant

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true copy of the foregoing was filed with the Clerk of Courts for the United States District Court for the Southern District of Ohio using the CM/ECF system, which will send notification of the filing to Dale Williams, U.S. Attorney's Office, 303 Marconi Boulevard, Suite 200, Columbus, Ohio 43215 on July 25, 2013.

/s/ Samuel H. Shamansky SAMUEL H. SHAMANSKY